

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)
ECF Case

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN)

JAMES P. KREINDLER, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *Ashton* plaintiffs in the above-captioned litigation and I submit this declaration in support of the motion for final judgment on behalf of the individual plaintiff listed in the exhibit attached hereto as Exhibit A, and for permission to allow any remaining *Ashton* plaintiffs to move for the same relief in separate stages.

2. The source of my information and the basis for my belief in my statements contained herein is my personal involvement in this matter for over 17 years; my firm's representation of the *Ashton* plaintiffs, including that family member listed in Exhibit A, in connection with the September 11th litigation; communications directly from family members of the individuals killed in the attacks on September 11th and the family of the plaintiff listed in Exhibit A; and other court records relating to the multi-district litigation to which the *Ashton* plaintiffs are parties. Any matters about which I lack personal knowledge are asserted herein upon information and belief.

3. The decedent listed in Exhibit A died in the September 11th terrorist attacks and is survived by the immediate family member listed in Exhibit A. The relationship set forth in Exhibit A has been personally verified by staff members in my office who have obtained written documentation, retrieved biographical paperwork (such as marriage certificates, birth certificates, baptismal certificates, obituary notices and wedding announcements) and/or conducted interviews with the family member listed in Exhibit A (or with their other family members) confirming the

relationship set forth there.

4. To minimize the chance of any human error, my firm has instituted a further level of quality control, during which each client's file is reviewed a second time and the relationship and other information contained in Exhibit A are corroborated, as is the fact that the claimant survived the death of his loved ones on September 11, 2001.

5. We have been retained by the plaintiff listed in Exhibit A to pursue recovery for his solatium losses arising out of the deaths of his loved ones on September 11, 2001. The claimant listed in Exhibit A is the immediate family member of a person killed on September 11, 2001 whose estate was previously awarded a final default judgment on liability against Iran in relation to the September 11, 2001 Terror Attack. We have verified that the plaintiff listed in Exhibit A has not previously recovered for his or her solatium damages previously by reviewing court dockets and cross-checking those individuals with other attorneys representing the relatives of persons killed on September 11, 2001, nor does he have any other pending motion before this Court for compensation against Iran arising out of the September 11th attacks.

6. As for that family member listed on Exhibit A, my office has confirmed his nationality based on either birth certificates, documentation previously submitted to government programs (such as the September 11th Victim Compensation Fund) and / or through written or verbal interviews with the claimant.

7. For all of the reasons set forth in this declaration and the *Ashton XV* Wrongful Death Plaintiff's Motion for Final Judgments, I respectfully request that this Court grant the proposed order.

Dated: September 11, 2019
New York, NY

/s/ James P. Kreindler
James P. Kreindler